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*Attorneys for Defendants Panasonic Corporation, Panasonic Corporation of North America, and MT Picture Display Co., Ltd.*

**IN THE UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION**

In re: CATHODE RAY TUBE (CRT)  
 ANTITRUST LITIGATION

Master Case No. 3:07-cv-05944-SC

MDL No. 1917

This Document Relates to:

Individual Case No. 3:14-cv-02510

*ViewSonic Corporation v. Chunghwa Picture Tubes, Ltd., et al.*, No. 3:14-cv-02510

**DECLARATION OF ADAM C. HEMLOCK IN SUPPORT OF THE PANASONIC DEFENDANTS' ADMINISTRATIVE MOTION TO FILE UNDER SEAL PURSUANT TO CIVIL LOCAL RULE 79-5(d) AND 7-11**

1       1. I am an attorney with Weil, Gotshal & Manges LLP, counsel for Defendants Panasonic  
2 Corporation, Panasonic Corporation of North America, and MT Picture Display Co., Ltd.  
3 (collectively, the “Panasonic Defendants”) in these actions. I am a member of the bar of the State of  
4 New York and I am admitted to practice before this Court pro hac vice.

5  
6       2. I submit this Declaration in support of the Panasonic Defendants’ Administrative Motion to  
7 File Documents Under Seal Pursuant to Civil Local Rules 79-5(d) and 7-11. I have personal  
8 knowledge of the facts stated herein and, if called as a witness, I could and would competently  
9 testify thereto.

10       3. On June 18, 2008, the Court approved a “Stipulated Protective Order” in this matter (Dkt. No.  
11 306) (the “Protective Order”).

12       4. Pursuant to the Protective Order and Local Civil Rules 7-11 and 79-5(d), the Panasonic  
13 Defendants seek to seal the following concurrently-filed documents: (a) the highlighted portions of the  
14 Panasonic Defendants’ Notice of Motion and Motion to Dismiss and to Compel Arbitration against  
15 Plaintiff ViewSonic Corporation (“ViewSonic”); and (b) the OEM supply agreement, included as  
16 Attachment A to the Declaration of Adam C. Hemlock in Support of the Panasonic Defendants’ Motion  
17 to Dismiss and to Compel Arbitration (“Hemlock Declaration in Support of Motion to Dismiss and  
18 Compel Arbitration”).

19  
20       5. Attachment A to the Hemlock Declaration in Support of Motion to Dismiss and Compel  
21 Arbitration is a document that was designated by ViewSonic as “Highly Confidential” under the terms  
22 of the Protective Order. The highlighted portions of the Panasonic Defendants’ Notice of Motion and  
23 Motion to Dismiss and to Compel Arbitration reference confidential information contained in  
24 Attachment A. Specifically, portions of pages i, 1, 2, 3, 4, 5, 7, and 8 of the Panasonic Defendants’  
25 Notice of Motion and Motion to Dismiss and to Compel Arbitration contain such confidential  
26 information.  
27

6. The Panasonic Defendants seek to submit the material referenced herein under seal in good faith in order to comply with the Protective Order in this action and the applicable Local Rules. Because the information in the materials that the Panasonic Defendants seek to submit under seal have been designated as “Highly Confidential” by ViewSonic (the “Designating Party”), the Panasonic Defendants are filing the accompanying Motion to File Under Seal, and will be prepared to file unredacted versions of the Panasonic Defendants’ Notice of Motion and Motion to Dismiss and to Compel Arbitration and Attachment A in the public record “[i]f the Designating Party does not file a responsive declaration as required by subsection 79-5(e)(1) and the Administrative Motion to File Under Seal is denied.” Civ. L.R. 79-5(e)(2).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 25, 2014 at New York, New York.

By: /s/ Adam C. Hemlock  
ADAM C. HEMLOCK